

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

RAMIL VENTURA PALAFOX
a/k/a "RV Palafox,"

Defendant.

Case No. 1:25-cr-52

Counts 1-8: 18 U.S.C. § 1343
(Wire Fraud)

Counts 9-13: 18 U.S.C. § 2314
(Inducing Interstate Travel)

Count 14: 18 U.S.C. § 1956(a)(1)(B)(i)
(Concealment Money Laundering)

Counts 15-23: 18 U.S.C. § 1957
(Unlawful Monetary Transactions)

Forfeiture Notice

Under Seal

INDICTMENT

March 2025 Term — Alexandria, Virginia

THE GRAND JURY CHARGES THAT:

COUNTS 1 THROUGH 8
(Wire Fraud)

At all times relevant to this Indictment, unless otherwise stated:

General Allegations

1. The Defendant, Ramil Ventura Palafox ("the defendant" or "PALAFOX"), is a dual citizen of the United States and the Philippines who principally resided in Las Vegas, Nevada.

2. Praetorian Group International was a Nevada company that purported to be an international bitcoin investment platform. Praetorian Group International was structured as a multilevel marketing company. Under such a structure, investors were promised additional

bonuses and payments for recruiting other individuals to invest into the business.

3. Praetorian Group International and its domestic and international subsidiaries and/or affiliates, including but not limited to PGI Global UK, PGI Global, Praetorian Group International Trading, Inc., Praetors Global, and Praetorian Group International OÜ, are referred to collectively herein as “PGI.”

4. PGI principally operated as an investment firm, soliciting investments from investors who believed their funds would be used for bitcoin trading. PGI promised that investors would earn a 0.5 to 3% daily return on their investments. Between December 2019 and October 2021, at least 90,000 investors worldwide, including investors located in the Eastern District of Virginia, invested at least \$200,000,000 in PGI.

5. PALAFOX owned and operated PGI and served as PGI’s Chairman and Chief Executive Officer and chief promoter. In these capacities, PALAFOX directed and controlled PGI’s international network of affiliates, promoters, master distributors, employees, and agents. PALAFOX also controlled what investors were paid, when they were paid, and how they were paid.

6. In addition to the defendant, others known and unknown acted as promoters for PGI. PALAFOX recruited and trained these promoters, who were called “master distributors,” among other titles, to present marketing materials supplied by PALAFOX about PGI’s purported business activity and guaranteed daily trading profits. The primary role of PGI’s promoters was to explain and generate excitement about PGI to recruit investors into the scheme, who would then be incentivized to recruit other investors into the scheme themselves. Some promoters also had operational and leadership roles and helped to manage PGI, and many promoters invested their own money in PGI.

7. Company 1 was an insurance marketplace company based out of the United Kingdom.

8. Company 2 was a Utah-based company that developed software enabling peer-to-peer money transfers, including of cryptocurrency.

9. Company 3 was a California-based company that provided pre-paid debit cards. Clients of Company 3 could fund pre-paid debit cards using fiat currency and then distribute the cards to their own clients.

10. Cryptocurrency Exchange 1 was a cryptocurrency exchange and trading platform owned and operated by Company 4, which was registered in the Seychelles.

11. Cryptocurrency Exchange 2 was a Canadian-based cryptocurrency exchange and trading platform.

12. “Fiat currency” is money issued by a government. U.S. dollars are a form of fiat currency.

13. “Cryptocurrency” is a digital currency that may be used as a substitute for fiat currency. There are multiple types of cryptocurrencies, such as Bitcoin. Cryptocurrency can be stored digitally on the Internet or in an electronic storage device. Cryptocurrency can be exchanged directly person to person, through a cryptocurrency exchange, or through other intermediaries. Most cryptocurrencies have a “blockchain,” which is an immutable and historical record of every transaction.

14. A “cryptocurrency address” is a unique identifier, composed of a string of letters and numbers, that serves as a virtual location where cryptocurrency is stored. Transactions between addresses are recorded on a blockchain.

15. Unless otherwise specified, all dates referenced in this Indictment are on or about,

and all monetary figures are approximate.

The Scheme and Artifice to Defraud and Its Objects

16. Between approximately December 2019 and October 2021, in the Eastern District of Virginia and elsewhere, the defendant,

RAMIL VENTURA PALAFOX

having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire communication in interstate and foreign commerce writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343.

17. It was the object of the scheme for PALAFOX to obtain funds from investors by knowingly making materially false representations and promises and by concealing material facts regarding PGI's profitability, licensures, business activity, expected investment returns, ability to make investment payments, and use of investors' funds.

Ways, Manner, and Means of the Scheme

18. The defendant executed the scheme through various ways, manner and means, including but not limited to:

19. PALAFOX and other promoters, acting at his direction, hosted online presentations, events, chat groups, videoconferences, and in-person presentations aimed at convincing investors to purchase PGI investment "packages" and to act as promoters for the scheme themselves. PALAFOX falsely promised that investors' funds would be used to trade bitcoin, that investments would generate daily returns ranging from .5% to 3%, that investors would double their money within six months, that the investments were secure, and that investors

would be able to easily withdraw their money weekly. PALAFOX also provided some investors with agreements or contracts that made similar fraudulent representations.

20. PALAFOX commonly used a PGI slide presentation during promotional events. While the presentation varied over time, it consistently described PGI and the bitcoin investment scheme and contained materially false and misleading statements about PGI's operations and daily returns. PALAFOX distributed and caused to be distributed these presentations to master distributors and promoters for use in promoting PGI.

21. PGI held events in the Eastern District of Virginia and in numerous other cities throughout the United States and internationally to highlight PGI's purported success and to induce investments. The events often included lavish spectacles in glamorous locales like Dubai and a Las Vegas penthouse. At one event, PALAFOX brought out a cash cannon that shot money into the air. Other events included an outing on a yacht and a desert safari in Dubai. PALAFOX also frequently displayed luxury cars at these events.

22. PALAFOX promised investors referral bonuses and commissions for successfully recruiting new investors, which he frequently failed to pay.

23. PALAFOX falsely represented to investors that their investments were safe by falsely claiming that his traders would make money whether the price of bitcoin rose or fell, that PGI had a diverse product line, and that certain investors' investments were insured by Company 1.

24. PALAFOX fraudulently represented that PGI had licenses to trade cryptocurrency in Estonia. In truth, PGI's Estonian affiliate, Praetorian Group International OÜ, did not have a virtual currency trading or exchanger license in Estonia.

25. PALAFOX misled investors as to PGI's bitcoin trading activity and how their investment funds were being used. For example, PALAFOX represented to investors that PGI's

traders were generating substantial returns by trading on Cryptocurrency Exchange 1 and Cryptocurrency Exchange 2 and that his traders were able to make money regardless of whether the price of bitcoin was going up or down. In truth, PGI was neither purchasing nor trading bitcoin with many investors' investments, and many investors lost all or some of their investments. Instead, PALAFOX used investors' funds to pay other investors, to further promote the scheme, and for personal expenditures, including for the purchase of millions of dollars' worth of luxury goods, real estate, and at least 20 high-end vehicles. Additionally, despite his representations, PGI was not engaged in extensive trading on either Cryptocurrency Exchange 1 or Cryptocurrency Exchange 2.

26. PALAFOX also used PGI's online investor portal to mispresent to investors the status and security of their investments. The PGI online portal, which was accessible to investors worldwide, including to investors residing in the Eastern District of Virginia, supposedly provided a means for investors to monitor their investments. From 2020 through 2021, the PGI online portal consistently and fraudulently indicated that investors' investments were gaining value. As a result of these misrepresentations, investors believed that their investments were profitable and secure.

27. Further, PALAFOX misrepresented to investors that they would be able to make periodic and weekly withdrawals. In reality, by February 2021, if not earlier, investors were frequently unable to withdraw their investments or their purported profits. PALAFOX stated and caused other promoters to state that PGI was having technical difficulties with its payment processors, but that PGI would eventually pay investors what they were owed. Between February 2021 and June 2021, PALAFOX told investors that PGI had formed relationships with two new payment processing companies, Company 2 and Company 3, and that those companies would facilitate payments. These were merely lulling statements. In truth, PALAFOX did not provide

either Company 2 or 3 with funds sufficient to support the investors' withdrawal requests.

Use of the Wires

28. On or about the dates specified as to each count below, in the Eastern District of Virginia and elsewhere, the defendant,

RAMIL VENTURA PALAFOX,

for the purpose of executing, and in furtherance of, the aforesaid scheme and artifice to defraud and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, did knowingly transmit and cause to be transmitted, by means of wire communications in interstate and foreign commerce, certain writings, signs, signals, pictures, and sounds, as more specifically described below, each count being a separate offense:

Count	On or About Date	Description of Wire
1	July 23, 2020	\$3,500 transmitted by INVESTOR 1 in the Eastern District of Virginia to PALAFOX's Citibank account ending 0974 outside Virginia
2	August 8, 2020	.087598 BTC transmitted by INVESTOR 1 in the Eastern District of Virginia to PALAFOX outside Virginia via Bitstamp
3	August 9, 2020	.086958 BTC transmitted by INVESTOR 1 in the Eastern District of Virginia to PALAFOX outside Virginia via Bitstamp
4	February 2, 2021	VID-20210202-WA00006.mp4 transmitted by PALAFOX in Nevada and received by INVESTOR 1 in the Eastern District of Virginia, among others
5	February 23, 2021	Live-stream of a presentation on PGI to the Eastern District of Virginia from outside Virginia
6	March 19, 2021	\$200,257 transmitted from INVESTOR 2's Bank of America account to PALAFOX's JPMC account ending 6066 through servers inside the Eastern District of Virginia and outside Virginia

7	March 29, 2021	\$20,000 transmitted from INVESTOR 3's Bank of America account to PALAFOX's JPMC account ending 6066 through servers inside the Eastern District of Virginia and outside Virginia
8	April 13, 2021	\$50,000 transmitted from INVESTOR 4's Bank of America account to PALAFOX's JPMC account ending 6066 through servers inside the Eastern District of Virginia and outside Virginia

(All in violation of 18 U.S.C. § 1343.)

COUNTS 9 THROUGH 13
(Inducing Interstate Travel with Intent to Defraud)

29. The scheme and artifice to defraud described in Paragraphs 1 to 15 and 17 to 27 of this Indictment are realleged and incorporated by reference herein.

30. On or about the dates shown below, in the Eastern District of Virginia and elsewhere, the defendant,

RAMIL VENTURA PALAFOX,

having devised and intending to devise the aforementioned scheme and artifice to defraud, and for obtaining money and property by means of materially false and fraudulent pretenses, representations, and promises, induced the persons identified below to travel in and to be transported in interstate commerce in the execution and concealment of the aforesaid scheme and artifice to defraud the persons identified below of money and property having a value of \$5,000 or more, each count being a separate offense:

Count	On or About Date	Investor	Description of Travel
9	July 31, 2020	INVESTOR 1	Virginia to Texas
10	May 13, 2021	INVESTOR 5	Virginia to Nevada
11	May 13, 2021	INVESTOR 6	Virginia to Nevada
12	June 14, 2021	INVESTOR 7	Virginia to Nevada
13	June 26, 2021	INVESTOR 8	Washington, D.C., to Virginia

(All in violation of 18 U.S.C. § 2314.)

COUNT 14
(Concealment Money Laundering)

31. The allegations contained in Paragraphs 1 to 15 of this Indictment are realleged and incorporated by reference herein.

32. On or about September 24, 2021 in the Eastern District of Virginia and elsewhere, the defendant, RAMIL VENTURA PALAFOX, did knowingly conduct and attempt to conduct a financial transaction, that is a \$200,000 wire transfer from PALAFOX's son's JPMC account ending 7691 to PALAFOX's Union Bank of the Philippines account, affecting interstate and foreign commerce, which in fact involved the proceeds of specified unlawful activity, that is, wire fraud in violation of 18 U.S.C. § 1343, knowing that the transaction was designed in whole and in part to conceal and disguise the nature, location, source, ownership, and control of the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transaction, the defendant knew that the property involved in the financial transaction represented the proceeds of some form of unlawful activity.

(All in violation of 18 U.S.C. § 1956(a)(1)(B)(i).)

COUNTS 15 THROUGH 23**(Monetary Transactions in Property Derived from Specified Unlawful Activity)**

33. The allegations contained in Paragraphs 1 to 15 of this Indictment are realleged and incorporated by reference herein.

34. On or about the dates set forth below, in the Eastern District of Virginia and elsewhere, the defendant, RAMIL VENTURA PALAFOX, did knowingly engage and attempt to engage in the following monetary transactions by, through, and to a financial institution affecting interstate commerce, in criminally derived property of a value greater than \$10,000, such property having been derived from specified unlawful activity, that is, wire fraud in violation of 18 U.S.C. § 1343, each count being a separate offense:

Count	On or About Date	Amount	Description of Transaction
15	July 29, 2020	\$100,000	Withdrawal from PALAFOX Citibank account ending 0974
16	August 8, 2020	\$280,000	Withdrawal of funds from BitLiquid
17	March 22, 2021	\$100,000	Check transfer from PALAFOX JPMC account 6066 to Chi Motors
18	March 29, 2021	\$110,000	Check transfer from PALAFOX JPMC account 6066 to Chi Motors
19	March 30, 2021	\$37,926	Check transfer from PALAFOX JPMC account ending 6066 paid to Design Therapy
20	April 21, 2021	\$385,000	Cashier's check transfer from PALAFOX JPMC account ending 6066 paid to Ferrari Maserati of Las Vegas
21	May 13, 2021	\$54,000	Check transfer from PALAFOX JPMC account ending 6066 paid to Chi Motors
22	May 19, 2021	\$50,000	Check transfer from PALAFOX JPMC account ending 6066 paid to Design Therapy

23	June 25, 2021	\$163,387	Check transfer from PALAFOX JPMC account ending 6066 paid to Design Therapy
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(All in violation of 18 U.S.C. § 1957.)

FORFEITURE NOTICE

THE GRAND JURY HEREBY FINDS PROBABLE CAUSE THAT:

Pursuant to Federal Rule of Criminal Procedure 32.2(a), defendant RAMIL VENTURA PALAFOX is hereby notified that upon conviction of the offenses alleged in Counts 1 through 13 of the Criminal Indictment, RAMIL VENTURA PALAFOX shall forfeit to the United States, pursuant to 18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c), any property, real or personal, constituting or derived from proceeds traceable to the offense.

Pursuant to Federal Rule of Criminal Procedure 32.2(a), defendant RAMIL VENTURA PALAFOX is hereby notified that upon conviction of the offenses alleged in Counts 14 through 23 of the Criminal Indictment, RAMIL VENTURA PALAFOX shall forfeit to the United States, pursuant to 18 U.S.C. § 982(a)(1), any property, real or personal, involved in the offense, or any property traceable to such property.

The assets subject to forfeiture include, but are not limited, to the following:

- a. 2001 BMW M3 with VIN # WBSBR93451EX21509;
- b. 2013 Tesla Model S with VIN # 5YJSA1DP9DFP13425;
- c. 2014 Audi A4 with VIN # WAUFFAFL3EN003630;
- d. 2014 BMW 750LX with VIN # WBAYF8C53ED142508;
- e. 2014 Ferrari 458 Special with VIN # ZFF75VFA7E0201996;
- f. 2014 Subaru Impreza with VIN # JF1GV8J61EL002420;
- g. 2015 Mercedes-Benz S550 with VIN # WDDUG8CB8FA082352;
- h. 2016 Bentley Continental with VIN # SCBGU3ZA1GC057321;
- i. 2016 Lamborghini Aventador with VIN # ZHWUR1ZD3GLA04291;
- j. 2016 Rolls-Royce Ghost with VIN # SCA664S58GUX53763;

- k. 2019 Porsche 911 Targa with VIN # WP0BB2A93KS125285;
- l. 2020 McLaren 720 S with VIN # SBM14FCA2LW004656;
- m. 2020 Mercedes-Benz G with VIN # W1NYC7HJ5LX363768;
- n. 2016 Tesla Model X with VIN # 5YJXCBE4XGF019793;
- o. 2020 Lamborghini Huracan with VIN # ZHWUT5ZF7LJA15489;
- p. 2020 Porsche Taycan Turbo with VIN # WP0AC2Y11LSA71207;
- q. 2021 Land Rover with VIN # SAILGU5SE0MA435683;
- r. \$56,141.90 in PNC Bank Account # 5532226943;
- s. \$41,168.17 in Cathay Bank Account # 34129057;
- t. \$45,092.27 in MUFG Union Bank Account # 23513351;
- u. \$720,458.50 in Lexicon Bank Account # 1500461;
- v. \$36,293.36 in Lexicon Bank Account # 1405744;
- w. Praetorsglobal.com;
- x. \$196,711.00 in U.S. Currency seized from a residence in Porter Ranch, California on October 13, 2021;
- y. One Valentino, bow-shaped evening bag, green, red, white cabochon and crystal 10.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- z. One Versace bag, smooth black leather, gold Medusa logo, CLG 561 529 273 665 seized from a residence in Porter Ranch, California on October 13, 2021;
- aa. One Louis Vuitton white pochette, multicolor Louis Vuitton logo, bumped corners, 8" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- bb. One Versace purse, black with gold "V" closure, small gold studs, leather stitching seized from a residence in Porter Ranch, California on October 13, 2021;
- cc. One Hermes Birkin bag, black, small scratch to one handle, two bumped bottom corners, 16" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- dd. One Louis Vuitton "Horizon 55", black rolling duffel, 20.5" long seized from a

- residence in Porter Ranch, California on October 13, 2021;
- ee. One Cartier passport wallet, red leather 5.5" long, monogramed "MMP" seized from a residence in Porter Ranch, California on October 13, 2021;
 - ff. One Gucci Rajah Chain tote GG tweed, with matching wallet seized from a residence in Porter Ranch, California on October 13, 2021;
 - gg. One Goyard, coated canvas, green "Boeing 45" monogramed "MMP" seized from a residence in Porter Ranch, California on October 13, 2021;
 - hh. One Dior handbag, 7.5" wide, gold snake skin bumped corners seized from a residence in Porter Ranch, California on October 13, 2021;
 - ii. One Louis Vuitton snake skin wallet, cream, 5.25" long seized from a residence in Porter Ranch, California on October 13, 2021;
 - jj. One Louis Vuitton, python skin 12" wide, grey seized from a residence in Porter Ranch, California on October 13, 2021;
 - kk. One Large Louis Vuitton Keepall Bandoulier 50, orange, 20.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
 - ll. One Louis Vuitton tote bag, multicolor limited edition speedy 30 bandouliere with cards print seized from a residence in Porter Ranch, California on October 13, 2021;
 - mm. One Chanel flap boy bag with top handle, blue, original price tag, serial number 26393641, seized from a residence in Porter Ranch, California on October 14, 2021;
 - nn. One Hermes Birkin bag, light pink (lavender) with Hermes scarf seized from a residence in Porter Ranch, California on October 15, 2021;
 - oo. One Dior pink & multi-color canvas book bag, 8" wide, with original price tag seized from a residence in Porter Ranch, California on October 13, 2021;
 - pp. One Louis Vuitton, navy, upside down monogram, limited edition speedy bag, 20" wide seized from a residence in Porter Ranch, California on October 14, 2021;
 - qq. One Chanel, beige caviar flap bag, 12" wide seized from a residence in Porter Ranch, California on October 15, 2021;
 - rr. One Hermes Birkin bag, grey, 12" wide seized from a residence in Porter Ranch, California on October 16, 2021;
 - ss. Dior coin purse, blue, 4.5" wide, logo embossed leather seized from a residence in Porter Ranch, California on October 13, 2021;

- tt. One Prada Vitello envelope coin purse, red, 4.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- uu. One Prada Vitello envelope wallet, red 7.8" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- vv. One Christian Louboutin Elisa Phone Pouch, pink or salmon box calf leather, 7" high, with original inventory tag and care instructions seized from a residence in Porter Ranch, California on October 13, 2021;
- ww. One Dior Flower canvas, medium book tote, 14.25" wide, with original price tag seized from a residence in Porter Ranch, California on October 13, 2021;
- xx. One Fendi F, Bifold wallet, zucca leather, 4.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- yy. One Christian Louboutin wallet "Panettone" wallet Spiked printed leather Multicolor, 7.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- zz. One Yves Saint Laurent wallet, purple, Matelasse Chevron, 4.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- aaa. One Cartier, "Mustline" style shoulder bag with flap, black, two small dents in leather seized from a residence in Porter Ranch, California on October 13, 2021;
- bbb. One Goyard "Saigon" purse, top handle, brown & black, 14" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- ccc. One Goyard "Saigon" Crocodile purse, turquoise and navy top handle, 10.75" wide, with original inventory tag seized from a residence in Porter Ranch, California on October 13, 2021;
- ddd. One Christian Louboutin Multicolor "Tarot" tote bag, 9.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- eee. One Yves Saint Laurent red quilted flap bag, Niki handles, 12.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- fff. One Valentino, Ivory rockstud, large quilted shoulder bag, 10.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- ggg. One Louis Vuitton outdoor backpack, canvas, monogram, 17" high seized from a residence in Porter Ranch, California on October 13, 2021;

- hhh. One Valentino Garavani, red quilted leather, rock stud shoulder strap and top handle, 9" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- iii. One Yves Saint Laurent Niki Chain flap bag Matelasse Chevron, dark green, 11.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- jjj. One Chanel Classic Single flap top handle bag quilted lambskin, black, extra mini, 6.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- kkk. One Chanel Classic Single flap top handle bag quilted lambskin, red, extra mini 6.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- lll. One Mini Lady Dior shiny crocodile evening bag, looping handle, bleu zircon (listed as: Turquoise), 6.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- mmm. One Hermes Touch Birkin bag, alligator top, ostrich bottom, epsom color, purple, 11.5" wide, with protective cover and matching scarf seized from a residence in Porter Ranch, California on October 13, 2021;
- nnn. One Pair Cartier eyeglasses seized from a residence in Porter Ranch, California on October 13, 2021;
- ooo. One Louis Vuitton wallet (listed as "hand purse"), canvas LV logo, with blue and yellow LV logo panel, 7.5" long seized from a residence in Porter Ranch, California on October 13, 2021;
- ppp. One Louis Vuitton black leather, embossed logo, messenger style flap bag, 11.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- qqq. One Louis Vuitton Backpack, canvas, monogram, 17" high seized from a residence in Porter Ranch, California on October 13, 2021;
- rrr. One Goyard Alto Hat box bag, green, 7" diameter, serial numbers 0812019 and 88000133, with original inventory tag seized from a residence in Porter Ranch, California on October 13, 2021;
- sss. One Goyard coin Case (listed as "wallet"), orange, 4.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- ttt. One Goyard coin Case (listed as "wallet"), navy, 4.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- uuu. One Gucci, beige Mickey Mouse wallet, 7.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;

- vvv. One Valentino Garavani messenger or crossbody bag, light brown, 10" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- www. One Chanel Sequin flap bag, 8.5" wide, serial number 30305759 and matching identification card seized from a residence in Porter Ranch, California on October 13, 2021;
- xxx. One Goyard Duffle bag, 22" wide, monogram "RVP", small rubbed area near foot seized from a residence in Porter Ranch, California on October 13, 2021;
- yyy. One Louis Vuitton sunglasses case, brown, monogram, red interior seized from a residence in Porter Ranch, California on October 13, 2021;
- zzz. One Louis Vuitton, "Empreinte" giant LV monogram, card holder, Rose color, 4.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- aaaa. One Louis Vuitton wallet, 7.5" long, embossed monogram, black, small white smudge on front cover seized from a residence in Porter Ranch, California on October 13, 2021;
- bbbb. One Gucci half-moon bag, black, monogram, approximately 12" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- cccc. One Louis Vuitton vertical bag, brown canvas logo, 6.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- dddd. One Louis Vuitton, Discovery Pochette monogram Eclipse, 14" seized from a residence in Porter Ranch, California on October 13, 2021;
- eeee. One Louis Vuitton navy canvas logo zippy pouch, upside down red logo marked "Have a Vuitton Day", approximately 8" high seized from a residence in Porter Ranch, California on October 13, 2021;
- ffff. One Dior book bag, 14.25" wide, white, not pictured seized from a residence in Porter Ranch, California on October 13, 2021;
- gggg. One Goyard Sénat Pouch GM, orange, 16" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- hhhh. One Louis Vuitton "Coussin" bag, zipper top with three sections, navy blue, 13" wide seized from a residence in Porter Ranch, California on October 13, 2021;
- iiii. One floral Christian Dior bag, black ground, 15.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

jjjj. One Louis Vuitton Taurillon Capucines wallet, 7.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

kkkk. One Goyard Anjou tote PM blue, 13" wide, "flamingo", with coin purse seized from a residence in Porter Ranch, California on October 13, 2021;

llll. One Christian Dior Lady Dior Chain bag "Cannage" quilt red patent leather, 9.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;

mmmm. One Valentino Garavani small rockstud leather handbag, 9" wide seized from a residence in Porter Ranch, California on October 13, 2021;

nnnn. One Chanel "Deauville" studded tote red, 17.75" wide, serial number 26644837 seized from a residence in Porter Ranch, California on October 13, 2021;

oooo. One Valentino Garvani, studded clutch, black, 6.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

pppp. One Chanel "Camelia", flap wallet, red, 4.25" wide, serial number 29580757 seized from a residence in Porter Ranch, California on October 13, 2021;

qqqq. One Goyard "Vendome" bag, green, 13.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

rrrr. One Botega Veneta "Cassette" crossbody bag Intrecciato leather, green, thick Gold Chain, 9.75" seized from a residence in Porter Ranch, California on October 13, 2021;

ssss. One Chanel coin purse, caviar, quilted, red, 4.25" wide, serial number 28676107 seized from a residence in Porter Ranch, California on October 13, 2021;

tttt. One Chanel "Camelia" trifold wallet, black, 4.25" wide, serial number, 2943681 seized from a residence in Porter Ranch, California on October 13, 2021;

uuuu. One Chanel flap clutch, red quilted leather, 8" wide, serial number 22862023, seized from a residence in Porter Ranch, California on October 13, 2021;

vvvv. One Chanel clutch, quilted lambskin, dark pink, 12" wide, Large "CC" leather logo, serial number 30011421, with original price tag, identification card seized from a residence in Porter Ranch, California on October 13, 2021;

www. One Chanel small flap bag with top handle, light pink, 9" wide, serial number 30267110 with matching identification card and original price tag seized from a residence in Porter Ranch, California on October 13, 2021;

xxxx. One Chanel classic quilted flap bag, peach, Coco handle, 11.25" wide, serial number 30242082 seized from a residence in Porter Ranch, California on October 13, 2021;

yyyy. One Chanel Classic Double flap bag, quilted lambskin, 11" wide, serial number 29531314 seized from a residence in Porter Ranch, California on October 13, 2021;

zzzz. One Chanel purse, quilted caviar jumbo flap bag, blue, 12" wide, serial number 29589234 seized from a residence in Porter Ranch, California on October 13, 2021;

aaaaa. Hermes "Lindy" blue swift leather handbag, 12" wide seized from a residence in Porter Ranch, California on October 13, 2021;

bbbbbb. One Christian Louboutin shoe-shaped crystal clutch, pink with detachable strap, 8" high

ccccc. One Christian Dior, python saddle bag purse, metal trim and accents, limited edition, 10.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;

dddddd. One Crocodile Hermes Birkin bag, red, 11.625" wide seized from a residence in Porter Ranch, California on October 13, 2021;

eeeeee. One Louis Vuitton wallet, brown and tan coated canvas, round coin purse with "Vivienne Venice" motif, zip closure, 3.75" diameter seized from a residence in Porter Ranch, California on October 13, 2021;

ffffff. One Louis Vuitton wallet, Epi Portofeuil Twist Tri-Fold wallet, red, 4.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;

gggggg. One Louis Vuitton brown zippy long wallet, "Damier" Christmas animation, bumper cars, 7.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

hhhhh. One Louis Vuitton black, packing cube, 13.5" wide, LV monogram seized from a residence in Porter Ranch, California on October 13, 2021;

iiiiii. One Louis Vuitton backpack, brown, 14.5" wide, rectangular shape, bottom corners lightly bumped seized from a residence in Porter Ranch, California on October 13, 2021;

jjjjj. One Louis Vuitton light pink, giant monogram and Raffia "By the Pool Hawaii" Edition "OnTheGo", 16.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;

kkkkk. One Louis Vuitton "Petite Malle", "Game on" handbag, black, multicolor logo, 8" wide, with detachable shoulder strap seized from a residence in Porter Ranch, California on October 13, 2021;

lllll. One Louis Vuitton, black and white "SINCE 1854" toiletry pouch, 9.5" wide, mmmmm. One Fendi brown "Peekaboo" handbag, top handle and shoulder strap handbag, woven fabric, 13" wide seized from a residence in Porter Ranch, California on October 13, 2021;

nnnnn. One Dior Saddle bag purse black canvas, silver hardware on strap, 10" wide seized from a residence in Porter Ranch, California on October 13, 2021;

ooooo. One Louis Vuitton "Surene" Handbag monogram Canvas, 14" wide, red side panels, chain handle seized from a residence in Porter Ranch, California on October 13, 2021;

ppppp. One Louis Vuitton "Game On" Speedy Bandouliere 25 white, 9.5" wide, with shoulder strap, seized from a residence in Porter Ranch, California on October 13, 2021;

qqqqq. One Louis Vuitton "Alma" white crocodile bag, 10" wide seized from a residence in Porter Ranch, California on October 13, 2021;

rrrrr. One Versace wallet (listed as: Valentino), black, 6.5" wide, leather loop for key chain seized from a residence in Porter Ranch, California on October 13, 2021;

sssss. One Valentino Garavani quilted red purse, black rock studs, 9" wide seized from a residence in Porter Ranch, California on October 13, 2021;

ttttt. One Versace "Virtus" black suede crystal clutch, studded (listed as: Valentino), 7.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

uuuuu. One Valentino, black, rockstud, quilted, shoulder bag, 9" wide, red top handle and patterned shoulder strap, with original price tag seized from a residence in Porter Ranch, California on October 13, 2021;

vvvvv. One Valentino wallet on a chain, black, quilted, rock studs, 9" wide with original Neiman Marcus price tag seized from a residence in Porter Ranch, California on October 13, 2021;

wwwww. One Hermes Compact wallet, Bleu Hydra, 4.75" wide seized from a residence in Porter Ranch, California on October 13, 2021;

xxxxx. One Versace purse (listed as: Valentino), green, snake leather, 12" wide, looping top handle, shoulder strap seized from a residence in Porter Ranch, California on October 13, 2021;

yyyyy. One Hermes Constance wallet, green shiny crocodile, 8" wide seized from a residence in Porter Ranch, California on October 13, 2021;

zzzzz. One Valentino, rockstud, quilted handbag with butterfly embroidery, 9" wide, with original price tag, extra studs seized from a residence in Porter Ranch, California on October 13, 2021;

aaaaa. One Hermes Kelly Long wallet Epsom leather, Rouge Tomate, (red), 6" wide seized from a residence in Porter Ranch, California on October 13, 2021;

bbbbbb. One pair Yves Saint Laurent, Tribute T-strap platform, beige, size 38, some wear to soles seized from a residence in Porter Ranch, California on October 13, 2021;

ccccc. One pair Yves Saint Laurent, "Tribute", T-strap platform, black, woven cloth heels, size 38 seized from a residence in Porter Ranch, California on October 13, 2021;

ddddd. One pair Gucci leather sneakers, lace-up, wear to soles, with shoe bag seized from a residence in Porter Ranch, California on October 13, 2021;

eeeeee. One pair Hermes "H" logo slides, stacked heels, beige, crystal embellishments, size 37.5, wear to soles seized from a residence in Porter Ranch, California on October 13, 2021;

fffff. One pair Chanel, blue suede open toe wedge-heel shoes, size 38, some wear to soles seized from a residence in Porter Ranch, California on October 13, 2021;

gggggg. One pair Louis Vuitton men's khaki high-tops, LV logo, lined, minor wear to soles seized from a residence in Porter Ranch, California on October 13, 2021;

hhhhh. One pair Manolo Blahnik kitten heel slides, black with crystal, size 38, wear to soles seized from a residence in Porter Ranch, California on October 13, 2021;

iiiiii. One pair Louis Vuitton men's canvas loafers, basketball player image seized from a residence in Porter Ranch, California on October 13, 2021;

jjjjj. One pair Louis Vuitton men's canvas loafers, multi-color monogram seized from a residence in Porter Ranch, California on October 13, 2021;

kkkkk. One Goyard Trunk, green, wood banding, 19" high seized from a residence in Porter Ranch, California on October 13, 2021;

lllll. One Louis Vuitton monogram, "Eclipse Horizon 55" roller luggage, black, 20" tall, original plastic protection on metal sides seized from a residence in Porter Ranch, California on October 13, 2021;

mmmmm. One Louis Vuitton Roller Luggage, blue, 20" tall seized from a residence in Porter Ranch, California on October 13, 2021;

nnnnn. One Goyard Roller Luggage, black, some scratches to leather seized from a residence in Porter Ranch, California on October 13, 2021;

ooooo. One Designer Wall Clock, resembles a wristwatch, with case seized from a residence in Porter Ranch, California on October 13, 2021;

ppppp. One I-Mac computer, new in box, 27" screen, model No. A2115, new in box seized from a residence in Porter Ranch, California on October 13, 2021;

qqqqq. One man's Rolex Cosmograph wristwatch stamped 750KT rose gold, serial #7A537635 sa#1 seized from a residence in Porter Ranch, California on October 13, 2021;

rrrrr. One man's Rolex President wristwatch stamped 750KT yellow gold, Serial#: M6446579 seized from a residence in Porter Ranch, California on October 13, 2021;

sssss. One man's Rolex President wristwatch stamped 750KT yellow gold seized from a residence in Porter Ranch, California on October 13, 2021;

ttttt. One man's Rolex Yacht-Master II wristwatch stamped 750KT white gold, Serial#: M071683 seized from a residence in Porter Ranch, California on October 13, 2021;

uuuuu. One man's Cartier Roadster wristwatch stamped 750KT white gold, Serial#: 3456CE 2618 seized from a residence in Porter Ranch, California on October 13, 2021;

vvvvv. One man's Hublot Spirit of Big Bang wristwatch, Serial#: 1377280 seized from a residence in Porter Ranch, California on October 13, 2021;

wwwww. One stamped 750KT white gold lady's Cartier Love Bracelet Bangle Bracelet with a box clasp with a bright polish finish, serial number 68332 seized from a residence in Porter Ranch, California on October 13, 2021;

xxxxx. One stamped 750KT white gold lady's Bangle bracelet with a box clasp with a bright polish finish. Trademark is VCA seized from a residence in Porter Ranch, California on October 13, 2021;

yyyyyy. One stamped 750KT white gold lady's Bangle bracelet with a safety clasp with a bright polish finish, trademark is Cartier, seized from a residence in Porter Ranch, California on October 13, 2021;

zzzzzz. One stamped 750KT white gold lady's bangle bracelet with a box clasp with a bright polish finish, Cartier Love bracelet is set with 10 diamonds, seized from a residence in Porter Ranch, California on October 13, 2021;

aaaaaaa. One stamped 750KT white and yellow unisex neck chain 24.5" long, heavy curb link with a lobster claw clasp with a bright polish finish, seized from a residence in Porter Ranch, California on October 13, 2021;

bbbbbbb. Louis Vuitton watch case with eight dividers and watch pads, 13.5" wide seized from a residence in Porter Ranch, California on October 13, 2021;

ccccccc. One man's Rolex Datejust wristwatch stamped, Serial #: 05F62315 seized from a residence in Porter Ranch, California on October 13, 2021;

ddddddd. One man's Rolex Sky-Dweller wristwatch, Serial#: X5R81303 seized from a residence in Porter Ranch, California on October 13, 2021;

ccceeee. One man's Rolex Yacht-Master wristwatch seized from a residence in Porter Ranch, California on October 13, 2021;

ffffff. One man's Cartier wristwatch seized from a residence in Porter Ranch, California on October 13, 2021;

ggggggg. One stamped 14KT yellow unisex neck chain 20.0" long, large braided design with a lobster claw clasp with a bright polish finish seized from a residence in Porter Ranch, California on October 13, 2021;

hhhhhhh. One stamped 14KT yellow gold unisex neck chain 22.5" long, large herringbone link with a lobster claw clasp seized from a residence in Porter Ranch, California on October 13, 2021;

iiiiiii. One stamped 750KT white and yellow gold unisex pendant and chain 24.0" long, large with a lobster claw clasp seized from a residence in Porter Ranch, California on October 13, 2021;

jjjjjjj. One stamped 14KT white gold man's identification bracelet with a box clasp with a bright polish finish seized from a residence in Porter Ranch, California on October 13, 2021;

kkkkkkk. One Chanel black, quilted flap bag, 12" wide, serial number 30024445 seized from a residence in Porter Ranch, California on October 13, 2021;

llllll. One stamped 750KT yellow gold lady's ring. Trademark is Cartier seized from a residence in Porter Ranch, California on October 13, 2021;

mmmmmmm. One Pair Dita sunglasses, white frame with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

nnnnnnn. One Pair Tom Ford sunglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

ooooooo. One Pair Tom Ford sunglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

ppppppp. One Pair Valentino sunglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

qqqqqqq. One Pair Tiffany eyeglasses with case and logo dust cloth seized from a residence in Porter Ranch, California on October 13, 2021;

rrrrrrr. One Pair Versace sunglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

sssssss. One Pair Versace designer belt with gold-tone Medusa logo surrounded by crystal seized from a residence in Porter Ranch, California on October 13, 2021;

ttttttt. One Pair Gucci sunglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

uuuuuuu. One Pair Gucci sunglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

vvvvvvv. One Pair Cartier eyeglasses, clear frame with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

wwwwwww. One Pair Louis Vuitton sunglasses with logo dust cover seized from a residence in Porter Ranch, California on October 13, 2021;

xxxxxxx. One Pair Louis Vuitton eyeglasses with logo case seized from a residence in Porter Ranch, California on October 13, 2021;

yyyyyyy. One Pair Louis Vuitton sunglasses with LV monogram case seized from a residence in Porter Ranch, California on October 13, 2021;

zzzzzzz. One Pair Louis Vuitton folding mirror, LV monogram case seized from a residence in Porter Ranch, California on October 13, 2021;

aaaaaaa. One Radiomir, Panerai wristwatch, black dial, Arabic hour markers, exhibition back seized from a residence in Porter Ranch, California on October 13, 2021;

bbbbbbbb. One Louis Vuitton trunk table clock, 5" wide seized from a residence in Porter Ranch, California on October 13, 2021;

cccccccc. One Louis Vuitton, monogram, navy, "Apollo" backpack, 14" high x 11" wide seized from a residence in Porter Ranch, California on October 13, 2021;

dddddddd. One Louis Vuitton, monogram, heart-shaped, handbag, 8.75" wide with dust bag seized from a residence in Porter Ranch, California on October 13, 2021;

eeeeeeee. One Louis Vuitton, navy crocodile bag, 12.25" wide seized from a residence in Porter Ranch, California on October 13, 2021;

ffffff. Goyard Luggage Set (3 pieces) seized from a residence in Porter Ranch, California on October 13, 2021;

gggggggg. Two Louis Vuitton - red Luggage Cases, serial numbers S36371 and S36370 seized from a residence in Porter Ranch, California on October 13, 2021; and

hhhhhhh. One Louis Vuitton logo trunk wood banding, serial number MZ06357 seized from a residence in Porter Ranch, California on October 13, 2021.

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Pursuant to 21 U.S.C. § 853(p), RAMIL VENTURA PALAFOX shall forfeit substitute property, if, by any act or omission of RAMIL VENTURA PALAFOX the property referenced above cannot be located upon the exercise of due diligence; has been transferred, sold to, or deposited with a third party; has been placed beyond the jurisdiction of the Court; has been substantially diminished in value; or has been commingled with other property which cannot be divided without difficulty.


(In accordance with Title 18, United States Code, Sections 982(a)(1) and 981(a)(1)(C); Title 21 United States Code, Section 853(p); Title 28 United States Code, Section 2461(c); and Rule 32.2(a), Federal Rules of Criminal Procedure.)

A TRUE BILL:

Pursuant to the E-Government Act,,
The original of this page has been filed
under seal in the Clerk's Office

FOREPERSON

ERIK S. SIEBERT
UNITED STATES ATTORNEY

A handwritten signature in black ink, appearing to read "Jack Morgan", is written over a horizontal line.

Jack Morgan
Zoe Bedell
Assistant United States Attorneys